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Attorney for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

THE ALASKA LANDMINE LLC and
JEFFREY LANDFIELD,

Plaintiffs,

v.

MICHAEL J. DUNLEAVY, in his
official capacity as Governor of the State
of Alaska; BEN STEVENS, in his official
capacity as Chief of Staff to the Governor
of the State of Alaska; and JEFF
TURNER, in his official capacity as
Deputy Communications Director
for the Office of the Governor of the State
of Alaska,

Defendants.

Case No.: 3:20-cv-00311-JMK

**MOTION FOR EXTENSION OF
TIME TO OPPOSE PLAINTIFFS’
MOTION FOR A PRELIMINARY
INJUNCTION**

Defendants move for a seven-day extension of time in which to oppose Plaintiffs’
Motion for a Preliminary Injunction given the complexity of the factual and legal subject
matter of the motion and that the fourteen-day time period allotted to respond includes

the Christmas and New Year's holiday weekends. Many State employees whose assistance will be important in preparing the opposition to the motion have scheduled time off over this holiday period including attorneys, law office staff, and individuals in the press office. Without an extension, Defendants' opposition will be due Wednesday, January 6th; with the requested seven-day extension, their opposition would be due Wednesday, January 13th.

Plaintiffs filed the complaint in this matter on December 17th, and moved for a preliminary injunction five days later on December 22nd. After removal, the plaintiffs repleaded in this Court today. Obviously, this is just before two back-to-back holiday weekends over a time period when many people have scheduled leave well in advance. The motion for a preliminary injunction involves extensive allegations of fact going back to 2017, which the State needs time to verify or rebut. The State also needs time to prepare its own factual record regarding the administrative and practical interests and processes of the Governor's press office to give the Court factual context for the State's defenses. The motion also raises complex questions of constitutional law. The seven-day extension is a modest request and will be important to enable Defendants to provide this Court with well-researched briefing and a robust factual record on which to make an informed decision.

DATED: December 23, 2020.

CLYDE "ED" SNIFFEN, JR.
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By: s/ Lael Harrison

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CERTIFICATE OF SERVICE

I certify that on December 23, 2020, the foregoing Extension of Time was served on the following via the CM/ECF electronic filing system.

Matthew Singer, Schwabe, Williamson & Wyatt, P.C.
Lee C. Baxter, Schwabe, Williamson & Wyatt, P.C.

s/ Lael Harrison

Lael A. Harrison, Assistant Attorney General